UNITED STATES DISTRICT COURT **DISTRICT OF MASSACHUSETTS**

DEBORAH GENATOSSIO and MICHAEL GENATOSSIO,

Plaintiffs

v.

CIVIL ACTION NO. 05-10881RGS

NORTH AMERICAN AIRLINES, INC.,

Defendant

PARTIES JOINT STATEMENT PURSUANT TO FED.R.CIV.P. 26(f) AND L.R. 16.1(b)

The parties to the above-captioned matter, by and through their attorneys, hereby state that:

- 1. Pursuant to Fed.R.Civ.P. 26(f) and L.R. 16.1(b), they conferred for the purpose of:
 - Preparing an agenda of matters to be discussed at the scheduling a. conference;
 - Preparing a proposed pretrial schedule for the case that includes a b. plan for discovery; and
 - Considering whether they will consent to trial by magistrate judge. c.
- 2. After consideration of the topics contemplated by Fed.R.Civ.P. 16(b) and 26(f) the parties propose the following pretrial schedule:

Pretrial Activity	<u>Date</u>
Required disclosures (26(a))	October 3, 2005
Written discovery requests	November 14, 2005
Motions to amend or supplement pleadings	December 12, 2005
Nonexpert disclosures by Plaintiff	January 12, 2006

Nonexpert disclosures by Defendant February 13, 2006

Final answers to expert interrogatories February 28, 2006

by plaintiff

Final answers to expert interrogatories March 13, 2006

by defendant

All discovery completed April 13, 2006

All dispositive motions filed June 30, 2006

Dated: September 8, 2005

Respectfully submitted,
Plaintiffs,
The Defendants,

DEBORAH GENATOSSIO AND NORTH AMERICAN AIRLINES, INC.

MICHAEL GENATOSSIO,

<u>/s/ Stanley Helinski</u> <u>/s/ Carey L. Bertrand</u>

Anthony Tarricone, BBO# Maynard M. Kirpalani, BBO#273940

Stanley Helinski, BBO# Carey Bertrand, BBO# 650496 Sarrouf, Tarricone & Fleming Wilson, Elser, Moskowitz,

95 Commercial Wharf Edelman & Dicker, LLP
Boston, MA 02110 155 Federal Street

(617) 227-5800 Boston, MA 02110 (617) 422-5300